COMMONWEALTH OF VIRGINIA
Department of Environmental Quality
Valley Regional Office

STATEMENT OF LEGAL AND FACTUAL BASIS

Green Bay Packaging Inc.
Winchester Coated Products Division
Frederick County, Virginia
Permit No. VRO81158

Title V of the 1990 Clean Air Act Amendments required each state to develop a permit program to ensure that certain facilities have federal Air Pollution Operating Permits, called Title V Operating Permits. As required by 40 CFR Part 70 and 9 VAC 5 Chapter 80, Green Bay Packaging has applied for renewal of the Title V Operating Permit for its pressure sensitive material manufacturing facility. The Department has reviewed the application and has prepared a draft Title V Operating Permit.

Engineer/Permit Contact:_____ Date:_____

Air Permit Manager:_____ Date:_____

Deputy Regional Director:_____ Date:_____

FACILITY INFORMATION

Permittee
Green Bay Packaging Inc.
P. O. Box 19017
Green Bay, WI 54307-9017

Facility
Green Bay Packaging Inc.
Winchester Coated Products Division
P. O. Box 3568
Winchester, VA 22604-2575

Plant ID No. 51-069-0108

SOURCE DESCRIPTION

Facility Description: SIC Code 2672 (Coated and Laminated Paper, NEC) and NAISC 322222 (Coated and Laminated Paper Manufacturing)

Green Bay Packaging Inc. - Winchester Coated Products Division manufactures pressure sensitive materials for the Roll Label industry. The material is manufactured in wide web, bulk roll form on a large machine called a tandem coating line. All coatings and laminating are done in one process. This process is broken down into various stages. Liner rolls are mounted on a turret and are coated with a solventless silicone. The silicone is applied to a gravure roll, which is deposited to a rubber roll and in turn is transferred to the liner. Dryer #1 cures the silicone on the liner. After a cooling and moisturizing stage, the liner is coated with a water-based adhesive by one of three methods. These methods are the Gravure, Mayer rod, or a slot die mechanism. Dryer #2 dries the adhesive. Facer rolls are mounted on the turret. A primer coating is applied to the backside of the face stock. The prime coat consists of a light coatweight of a clay slurry applied by either Mayer rod or Gravure methods. Dryer #3 dries the prime coat. The face material then comes in contact with the silicone-coated liner carrying adhesive in the laminating station. The combined product is rewound into larger diameter rolls. Emission sources include the coating operations and the gas-fired dryers.

The facility is a Title V major source of volatile organic compounds (VOC) and total hazardous air pollutants (THAP). This source is located in an attainment area for all pollutants, and is a PSD minor source. The facility was previously permitted under a Minor NSR Permit issued on January 21, 2004.

COMPLIANCE STATUS

The facility is inspected biennially. The most recent inspection was conducted on August 12 and 13, 2002 and the facility was found to be operating in compliance.

EMISSION UNIT AND CONTROL DEVICE IDENTIFICATION

The emissions units at this facility consist of the following:

Emission Unit ID	Stack ID	Emission Unit Description	Size/Rated Capacity*	Pollution Control Device (PCD) Description	PCD ID	Pollutant Controlled	Applicable Permit Date**
Tandem Coating Line							
1		Egan Machinery Company #920282 (constructed 1992) (NSPS Subpart RR) with a total gas-fired rated capacity of 14.4 mmBTU per hour, consisting of:		---	---	---	01/21/04
	1A/1B	A- Adhesive Application/Dryer #2	563 gallons/hour				
		B – Primer Application/Dryer #3	187 gallons/hour				
	1C	C- Silicone Application/Dryer #1	19 gallons/hour				
Tandem Coating Line							
2		Faustel (or equivalent)(not yet installed) (NSPS Subpart RR) with a total gas-fired rated capacity of 14.4 mmBTU per hour, consisting of:		---	----	---	01/21/04
	2A/2B	A- Adhesive Application/Dryer #2	563 gallons/hour				
		B – Primer Application/Dryer #3	187 gallons/hour				
	2C	C- Silicone Application/Dryer #1	19 gallons/hour				

*The Size/Rated capacity is provided for informational purposes only, and is not an applicable requirement.
**Minor New Source Review permit dated 01/21/04 is for the modification of the existing tandem emulsion coating line (Unit 1) and for the installation and operation of a second tandem emulsion coating line (Unit 2) for the facility.

EMISSIONS INVENTORY

A copy of the 2002 emission inventory report is included as Attachment A. Emissions are summarized in the following tables.

2002 Actual Emissions

	Criteria Pollutant Emission in Tons/Year				
Emission Unit	VOC	CO	SO_2	PM-10	NO_x
Unit 1*	17.5	1.03	0.01	1.01	1.23
Unit 2**	0	0	0	0	0
Total	17.5	1.03	0.01	1.01	1.23

* Includes fuel burning
** Unit not installed as of February 2004

2002 Facility Hazardous Air Pollutant Emissions

Pollutant	Hazardous Air Pollutant Emission in Tons/Year
Vinyl Acetate	3.53
Acetaldehyde	0.48
Formaldehyde	0.12

EMISSION UNIT APPLICABLE REQUIREMENTS

Tandem Emulsion Coating Line (Unit 1)

Limitations

The tandem emulsion coating line (Unit 1) is subject to 40 CFR 60 Subpart RR - Standards of Performance for Pressure Sensitive Tape and Label Surface Coating Operations. All applicable limitations from Subpart RR have been included in the permit. The following limitations are state BACT and other applicable requirements from the state minor NSR permit issued on January 21, 2004 and Subpart RR. Please note that the condition numbers are from the 2004 permit; a copy of the permit is included as Attachment B.

Condition 7: Limits VOC emissions to 0.20 pounds of VOC per pound of coating solids applied. This limit is to be calculated on a weighted monthly average. (NSPS Subpart RR)

Condition 3: Limits VOC emissions by requiring the use of water based adhesives.

Condition 4: Requires proper handling of VOCs to minimize emissions.

Condition 8: Emission limits in lbs/day and tons/yr for PM and PM-10, and tons/yr for VOC. Annual emissions are to be calculated monthly as the sum of each consecutive 12-month period. These limits apply only to the coating operations.

Condition 10: Visible emission limit of 5% opacity on tandem coating line stacks 1A/1B and 1C.

Condition 31: Invalidates conditions for modification of Unit 1 if modification is not commenced by July 21, 2005 or if modification is discontinued for a period of 18 months or more.

As part of the Early Action Compact for Frederick County the following Virginia Administrative codes (Emission Standards for Paper and Fabric Coating Application Systems (Rule 4-31)) that have specified requirements have been determined to be applicable and included in the permit:

9 VAC 5-40-4330, Standard for volatile organic compounds
9 VAC 5-40-4340, Control Technology Guidelines
9 VAC 5-40-4390, Compliance
9 VAC 5-40-4420, Records

Monitoring and Recordkeeping

All applicable monitoring requirements from the minor NSR permit and Subpart RR have been included in the permit. The permittee will monitor and record on a daily basis the total amount of coating material used and the weighted average VOC and solids fractions of each coating applied using the coating manufacturer's formulation data as required by the minor NSR permit and NSPS Subpart RR. The permittee will calculate, on a daily basis, the VOC to solids ratio and the total pounds of VOCs, PM and PM-10 emitted. Equations for calculating the VOC to solids ratio and emissions from VOCs and PM/PM-10 have been included in the permit. Compliance with the VOC weighted monthly average, PM and PM-10 daily and annual limits, and VOC annual limits can all be demonstrated with a mass balance approach. Therefore, the recordkeeping requirements are adequate to satisfy the periodic monitoring requirement for these limits.

Although there is not a VOC limit in the permit for cleaning solvents, there is a requirement for monitoring and recordkeeping of cleaning solvent usage. These requirements were added as part of the minor NSR permit in cooperation with the permittee to track the facility's efforts to minimize the use of cleaning solvents.

The permit requires records to show that each coating as applied meets the 2.9 pounds per gallon limit.

An initial Visible Emission Evaluation (VEE) is required after Unit 1 has been modified. Although visible emissions have not been a concern in the past, the initial VEE will verify that the modified unit can meet the 5% opacity limit. No additional monitoring for visible emissions has been required.

The permit includes requirements for maintaining records of all monitoring. These records include the VOC content of cleaning solvents, certified Material Safety Data Sheets/VOC Data Sheets or other equivalent documentation, amount of coating material used, weighted average VOC and solids fractions, the VOC to solids ratio, the total pounds of VOC, PM, and PM-10 emitted, and VEE and performance evaluation results.

Compliance Assurance Monitoring (CAM)

This facility does not have any add-on control equipment and is therefore not subject to CAM.

Testing

An initial performance test is required once Unit 1 has been modified. The test will ensure the modified unit can meet the NSPS Subpart RR emission limit. Copies of the tests are to be sent to DEQ and to EPA.

An initial VEE is also required by the Department.

The Department and EPA have authority to require testing not included in this permit if necessary to determine compliance with an emission limit or standard.

Reporting

The permit includes quarterly/semi-annual reporting of exceedances of the NSPS Subpart RR VOC emission limit. A schedule of reporting periods and report due dates are included in the permit. Additional information to be included in the report includes monthly and annual throughput and VOC content of cleaning solvents used, weighted average VOC and solids fractions of each coating applied, the VOC to solids ratio, and the total pounds of VOC, PM, and PM-10 emitted. Copies of the reports are to be sent to DEQ and EPA.

Notifications

The permit includes written notification requirements for Unit 1 including date modification commenced, anticipated start-up date, actual start-up date, and anticipated date of VEE.

Streamlined Requirements

The 5% opacity limit for the stacks of Unit 1 is more stringent than the Virginia Administrative Code Standard for visible emissions, 9 VAC 5-50-80, 9 VAC 5-40-4350, and 9 VAC 5-40-4360. Therefore, only the more stringent 5% opacity was included in the permit.

Tandem Emulsion Coating Line (Unit 2)

Limitations

The tandem emulsion coating line (Unit 2) is subject to 40 CFR 60 Subpart RR - Standards of Performance for Pressure Sensitive Tape and Label Surface Coating Operations. All applicable limitations from Subpart RR have been included in the permit and become effective upon installation of the unit. The following limitations are state BACT and other applicable requirements from the state minor NSR permit issued on January 21, 2004 and Subpart RR. Please note that the condition numbers are from the 2004 permit; a copy of the permit is included as Attachment B.

Condition 7: Limits VOC emissions to 0.20 pounds of VOC per pound of coating solids applied. This limit is to be calculated on a weighted monthly average.

Condition 3: Limits VOC emissions by requiring the use of water based adhesives.

Condition 4: Requires proper handling of VOCs to minimize emissions.

Condition 9: Emission limits in lbs/day and tons/yr for PM and PM-10, and tons/yr for VOC. Annual emissions are to be calculated monthly as the sum of each consecutive 12-month period. These limits apply only to the coating operations.

Condition 10: Visible emission limit of 5% opacity on tandem coating line stacks 2A/2B and 2C.

Condition 31: Invalidates conditions for installation of Unit 2 if installation is not commenced by July 21, 2005 or if installation is discontinued for a period of 18 months or more.

As part of the Early Action Compact for Frederick County the following Virginia Administrative

codes (Emission Standards for Paper and Fabric Coating Application Systems (Rule 4-31)) that have specified requirements have been determined to be applicable and included in the permit:

9 VAC 5-40-4330, Standard for volatile organic compounds
9 VAC 5-40-4340, Control Technology Guidelines
9 VAC 5-40-4390, Compliance
9 VAC 5-40-4420, Records

Monitoring and Recordkeeping

All applicable monitoring requirements from the minor NSR permit and Subpart RR have been included in the permit. The permittee will monitor and record on a daily basis the total amount of coating material used and the weighted average VOC and solids fractions of each coating applied using the coating manufacturer's formulation data. The permittee will calculate, on a daily basis, the VOC to solids ratio and the total pounds of VOCs, PM and PM-10 emitted. Equations for calculating the VOC to solids ratio and emissions from VOCs and PM/PM-10 have been included in the permit. Compliance with the VOC weighted monthly average, PM and PM-10 daily and annual limits, and VOC annual limits can all be demonstrated with a mass balance approach. Therefore, the recordkeeping requirements are adequate to satisfy the periodic monitoring requirement for these limits.

Although there is not a VOC limit in the permit for cleaning solvents, there is a requirement for monitoring and recordkeeping of cleaning solvent usage. These requirements were added as part of the minor NSR permit in cooperation with the permittee to track the facility's efforts to minimize the use of cleaning solvents.

An initial Visible Emission Evaluation (VEE) is required after Unit 2 has been installed. Although visible emissions have not been a concern in the past, the initial VEE will verify that the new unit can meet the 5% opacity limit. No additional monitoring for visible emissions has been required.

The permit requires records to show that each coating as applied meets the 2.9 pounds per gallon limit.

The permit includes requirements for maintaining records of all monitoring. These records include the VOC content of cleaning solvents, certified Material Safety Data Sheets/VOC Data Sheets or other equivalent documentation, amount of coating material used, weighted average VOC and solids fractions, the VOC to solids ratio, the total pounds of VOC, PM, and PM-10 emitted, and VEE and performance evaluation results.

Compliance Assurance Monitoring (CAM)

This facility does not have any add-on control equipment and is therefore not subject to CAM.

Testing

An initial performance test is required once Unit 2 has been installed. The test will ensure the new unit can meet the NSPS Subpart RR emission limit. Copies of the tests are to be sent to DEQ and to EPA.

An initial VEE is also required by the Department.

The Department and EPA have authority to require testing not included in this permit if necessary to determine compliance with an emission limit or standard.

Reporting

The permit includes quarterly/semi-annual reporting of exceedances of the NSPS Subpart RR VOC emission limit. A schedule of reporting periods and report due dates are included in the permit. Additional information to be included in the report includes monthly and annual throughput and VOC content of cleaning solvents used, weighted average VOC and solids fractions of each coating applied, the VOC to solids ratio, and the total pounds of VOC, PM, and PM-10 emitted. Copies of the reports are to be sent to DEQ and EPA.

Notifications

The permit includes written notification requirements for Unit 2 including date installation commenced, anticipated start-up date, actual start-up date, and anticipated date of VEE.

Streamlined Requirements

The 5% opacity limit for the stacks of Unit 1 is more stringent than the Virginia Administrative Code Standard for visible emissions, 9 VAC 5-50-80, 9 VAC 5-40-4350, and 9 VAC 5-40-4360. Therefore, only the more stringent 5% opacity was included in the permit.

Fuel Burning Equipment

Limitations

The following limitations are state BACT and other requirements from the minor NSR permit issued on January 21, 2004. Please note that the condition numbers are from the 2004 permit; a copy of the permit is included as Attachment B.

Condition 5: Limits fuels to be used at the facility to natural gas and liquid petroleum gas (propane).

Condition 6: Limits nitrogen oxide emissions from all fuel burning equipment to 93.2

pounds per day when burning natural gas and 193.5 pounds per day when burning propane (limit requested by permittee).

The following Virginia Administrative codes that have specified requirements have been determined to be applicable and included in the permit:

9 VAC 5-40-280, Standard for Sulfur Dioxide, Combustion installations.

The following Virginia Administrative Code that has specific emission requirements has been determined to be applicable, but has not been included in the permit because the facility process does not have the potential to emit the regulated pollutant:

9 VAC 5-40-290, Standard for Hydrogen Sulfide

Monitoring and Recordkeeping

The permittee will monitor types of fuel purchased. The permittee will keep records of daily and annual throughput of each type of fuel. Annual fuel throughput recordkeeping is for fee purposes only.

Actual nitrogen oxide (as NO_2) emissions from the operation of all fuel burning equipment will be calculated using the following equations:

For natural gas combustion

$$E = F \times N$$

..... Equation 1

Where:

E = Emission Rate (lb/time period)

F = Pollutant specific emission factor as follows:

NO_x = 100.0 lb/million ft^3

N = Natural gas consumed (million ft^3/time period)

For liquid petroleum gas (propane) combustion

$$E = F \times P$$

..... Equation 2

Where:

E = Emission Rate (lb/time period)

F = Pollutant specific emission factors as follows:

NO_x = 19.0 lb/1000 gal

P = liquid petroleum gas (propane) consumed (1000 gal/time period)

The daily emission limits for nitrogen oxide (as NO_2) are based on the capacity of the fuel burning equipment. Therefore, if the fuel burning equipment is operated at capacity, or below, there should not be a violation of the daily emission rates. Calculations have been included in Attachment C to demonstrate how the limits were obtained.

The fuel burning unit for each tandem coating line is rated at 14.4 mmBtu/hr heat input. Using the standard for sulfur dioxide formula in the permit (S=2.64K where S = the allowable emission of the sulfur dioxide in pound per hour and K = the actual heat input at total capacity expressed in mmBtu/hr), the allowable sulfur dioxide emissions equals 76.032 lb/hr. Based on EPA AP-42 emission factors, the maximum sulfur dioxide emissions from the unit are as follows:

Fuel Type	Capacity of Fuel Burning Equipment	Maximum Hourly Throughput	AP-42 Emission Factor for Sulfur Dioxide	Maximum Sulfur Content (S)	Maximum lb/hr Emissions of Sulfur Dioxide	Sulfur Dioxide Emission Standard
Natural Gas	28.8 mmBtu/hr	0.0288 mmcf/hr	0.6 lb/mmcf	negligible	0.0173 lb/hr	76.032 lb/hr
Propane	28.8 mmBtu/hr	0.314 mgal/hr	0.1S lb/mgal	15 gr/100cf	0.471 lb/hr	76.032 lb/hr

As shown in the table above, the maximum hourly emission of sulfur dioxide is only a small fraction of the allowable. As long as natural gas or propane is combusted in the dryers, the hourly sulfur dioxide limit can not be exceeded. Therefore, limitations on fuel type combined with the monitoring of type of fuel purchased provides a reasonable assurance that the sulfur dioxide emission limitation is being met and thus satisfies the periodic monitoring requirement.

The permit includes requirements for maintaining records of all monitoring. These records include the DEQ approved, pollutant-specific emission factors and the equations used to demonstrate compliance with Condition V.A.2, fuel throughput limit, and fuel purchase records.

Testing

The permit does not require source emission tests for this unit. A table of test methods has been included in the permit if testing is performed. The Department and EPA have authority to require testing not included in this permit if necessary to determine compliance with an emission limit or standard.

Reporting

There are no reporting requirements for the fuel burning equipment.

Facility Wide Requirements for Hazardous Air Pollutants (Sections VI and VII)

Applicability

The facility is subject to the 40 CFR 63 Subpart JJJJ, National Emission Standards for Hazardous Air Pollutants: Paper and Other Web Coating (POWC MACT). The requirements will become effective December 5, 2005. The permit contains two options for utilizing compliant coatings. Section VI contains the permittee's preferred compliance option and Section VII contains the alternative compliance option. The permittee has elected not to pursue add-on controls as an option.

The permittee is required to maintain a log to record which compliance option is in effect at any given time. Log entries are to be made contemporaneous with the change and must include the date the change was made and the compliance option in effect.

Limitations

All applicable limitations from the POWC MACT have been included in the permit. Being subject to the POWC MACT means that the permittee is also subject to 40 CFR 63 Subpart A, General Provisions. Any applicable limitations from the general provisions have also been included in the permit.

Monitoring

The POWC MACT contains requirements for continuous compliance, including monthly recordkeeping. The POWC MACT contains adequate monitoring to meet the periodic monitoring requirements, so no additional monitoring has been incorporated into the Title V permit.

Compliance Assurance Monitoring (CAM)

This facility does not have any add-on control equipment and is therefore not subject to CAM.

Recordkeeping

The POWC MACT contains requirements for recordkeeping including organic HAP content, volatile matter and coating solids content data, and organic HAP usage, volatile matter usage, and coating solids usage.

The permittee is required to maintain a log for tracking which compliance option is in effect at any given time. The log entry must be made contemporaneously with the change including the date of the change and the compliance option in effect.

Testing

Performance tests for "as-purchased" organic HAP mass fraction, performance tests for as-applied organic HAP mass fraction, performance tests for volatile organic and coating solids content, and performance tests for volatile organic and coating solids content have been included in the permit in accordance with 40 CFR 63.3360.

A table of test methods has been included in the permit if testing is performed beyond that required in the permit. The Department and EPA have the authority to require testing not included in this permit if necessary to determine compliance with an emission limit or standard.

Reporting

The POWC MACT contains requirements for the submission of a semi-annual compliance report of exceedances of applicable emission limitations. These requirements have been included in the permit and will be submitted concurrently with the reporting requirements contained in 9 VAC 5-80-110.

Notifications

The POWC MACT contains requirements for an initial compliance notification and 60 day advance notice for performance testing. These requirements have been included in the permit.

Streamlined Requirements

The initial applicability notification requirement has already been completed for the POWC MACT. Therefore this notification has not been included in the permit. Also, because the facility has chosen to meet the POWC MACT through coating formulations, all references to add on control equipment have not been included in the permit.

GENERAL CONDITIONS

The permit contains general conditions required by 40 CFR Part 70 and 9 VAC 5-80-110, that apply to all Federal operating permit sources. These include requirements for submitting semi-annual monitoring reports and an annual compliance certification report. The permit also requires notification of deviations from permit requirements or any excess emissions.

FUTURE APPLICABLE REQUIREMENTS

The POWC MACT and State RACT requirements specifically Emission Standards for Paper and Fabric Coating Application Systems (Rule 4-31) will become applicable during the term of the permit and the applicable requirements for each rule have been included in permit.

INAPPLICABLE REQUIREMENTS

Inapplicable requirements identified by the applicant include 40 CFR 60 Subpart Kb - Standards of Performance for Volatile Organic Liquid Storage Vessels (including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984. The applicant has stated that this regulation is not applicable for any of the storage tanks (Units 4 through 43) because each unit is below the applicability capacity of less than 75 m^3 (19,812.9 gallons).

INSIGNIFICANT EMISSION UNITS

The insignificant emission units are presumed to be in compliance with all requirements of the Clean Air Act as may apply. Based on this presumption, no monitoring, recordkeeping or reporting shall be required for these emission units in accordance with 9 VAC 5-80-110.

Insignificant emission units include the following:

Emission Unit No.	Emission Unit Description	Citation	Pollutant(s) Emitted (9 VAC 5-80-720 B)	Rated Capacity (9 VAC 5-80-720 C)
1A/1B, 1C 2A/2B, 2C	Cleaning/Maintenance Activities	9 VAC 5-80-720 B	VOC, HAPs	
3A	Humidification Boiler & Boiler Water Chemicals	9 VAC 5-80-720 C	VOC, HAPs, PM/PM-10, NO_x, CO, SO_x	1,650,000 BTU/hr
3B	Hot Water Heaters & Boiler Water Chemicals	9 VAC 5-80-720 C	VOC, HAPs, PM/PM-10, NO_x, CO, SO_x	250,000 BTU/hr
3C, 3D	Office Heating Boiler & Boiler Water Chemicals	9 VAC 5-80-720 C	VOC, HAPs, PM/PM-10, NO_x, CO, SO_x	650,000 BTU/hr
3E – 3J	Space Unit Heaters	9 VAC 5-80-720 C	VOC, HAPs, PM/PM-10, NO_x, CO, SO_x	1,200,000 BUT/hr
3K – 3O	Dock Door Heaters	9 VAC 5-80-720 C	VOC, HAPs, PM/PM-10, NO_x, CO, SO_x	650,000 BTU/hr
3P	Maintenance Heater	9 VAC 5-80-720 C	VOC, HAPs, PM/PM-10, NO_x,	60,000 BTU/hr

Emission Unit No.	Emission Unit Description	Citation	Pollutant(s) Emitted (9 VAC 5-80-720 B)	Rated Capacity (9 VAC 5-80-720 C)
			CO, SO_x	
3Q	Tank Room Heater	9 VAC 5-80-720 C	VOC, HAPs, PM/PM-10, NO_x, CO, SO_x	75,000 BTU/hr
3R	Cleaver-Brooks Steam Generating Boiler & Boiler Water Chemicals	9 VAC 5-80-720 C	VOC, HAPs, PM/PM-10, NO_x, CO, SO_x	1,045,000 BTU/hr
3S	Plant Area Heater	9 VAC 5-80-720 C	VOC, HAPs, PM/PM-10, NO_x, CO, SO_x	60, 000 BTU/hr
4-9, 16-43	Fixed Roof Internal Storage Tanks for Water-based Adhesives/Primers	9 VAC 5-80-720 B	VOC, HAPs	8,325 Gallons
10-15	Fixed Roof Internal Storage Tanks for Water-based Adhesives/Primers	9 VAC 5-80-720 B	VOC, HAPs	2,646 Gallons
44	Safety Kleen Parts Washer or Equivalent (solvent or aqueous based	9 VAC 5-80-720 B	VOC, HAPs	30 Gallon Unit
45	Slitters / Rewinders / Trim Conveying / Coaters Web Cleaning Dust Collection Units / Silicone Mist Vacuum Units / Core Cutters	9 VAC 5-80-720 B	VOC, PM/PM-10	-
46	Lime Make-up Tanks for the Batch Wastewater Pretreatment System	9 VAC 5-80-720 B	PM/PM-10	-
47	Diatomaceous Earth (or equivalent) Make-up Tanks for the Batch Wastewater Pretreatment System	9 VAC 5-80-720 B	PM/PM-10	-
48	Wastewater Pretreatment System Chemicals (e.g. polymers, alum, ferrous sulfate, ferric chloride)	9 VAC 5-80-720 B	VOC, HAPs, PM/PM-10	-

Emission Unit No.	Emission Unit Description	Citation	Pollutant(s) Emitted (9 VAC 5-80-720 B)	Rated Capacity (9 VAC 5-80-720 C)
49	Shrink Wrap Heat Guns / System	9 VAC 5-80-720 B	VOC	-

[1]The citation criteria for insignificant activities are as follows:
9 VAC 5-80-720 A - Listed Insignificant Activity, Not Included in Permit Application
9 VAC 5-80-720 B - Insignificant due to emission levels
9 VAC 5-80-720 C - Insignificant due to size or production rate

CONFIDENTIAL INFORMATION

The permittee submitted a request for confidentiality for the following portions of their Title V application: VOCs and HAPs in the inks, coatings, stains, and adhesive materials and calculations associated with these materials. The permittee maintains that release of this information would provide competitors information that could be used to calculate specific production capabilities, capacities, processes, and/or procedures and that it would cause substantial harm to the company's competitiveness. The permittee considers this information to be proprietary and confidential within Green Bay Packaging Inc. and has undertaken measures to protect from disclosure to the general public, its customers, and its own employees. The VADEQ granted this request for confidential status in a letter to the permittee dated July 23, 2003.

PUBLIC PARTICIPATION

A public notice appeared in the Winchester Star on February 27, 2004 announcing a 30-day public comment period for this permit. The public comment period ended on March 29, 2004, and EPA's comment period ended on April 13, 2004 (concurrent review of the permit as both draft and proposed). No comments were received from the public or EPA.